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January 27, 2022

VIA ECF

Hon. Kenneth M. Karas
United States District Court, Southern District of New York
300 Quarropas Street, Chambers 521
White Plains, New York 10601

Re:

Jane Doe v. County of Rockland, Rockland County Sheriff's Office – Corrections Division, Rockland County Correctional Center And Its Employees, John Doe/JaneDoe – Rockland County Sheriff's Office And Its Employees, C.O. Christopher Taggart and C.O. John Kezek, John Does/JaneDoes I-4, individual and in their official capacity; (the names John and Jane Does being fictitious as the true names of all are presently unknown) SDNY Docket No.: 21-cv-6751

Dear Judge Karas:

We represent defendant the County of Rockland (also sued as the Rockland County Sheriff's Office, the Rockland County Sheriff's office - Correctional Division, and the Rockland County Correctional Center) in this § 1983 civil rights case. With regard to our motion to dismiss. we respectfully request a three week extension of the deadline for our combined reply brief and opposition to plaintiff's motion to amend her complaint. The current deadline for submission of our brief is January 28, 2022, thus the new deadline would be February 18, 2022. We request this extension because I have been in the midst of numerous other briefs over the last two weeks, including an appellants' brief that was due in the Appellate Division, Second Department yesterday, a reply brief in support of a motion to dismiss that is due today in Supreme Court, Rockland County, opposition to an Appellate Division motion that was due Monday January 17, and opposition to an Order to Show Cause to vacate a \$560,000 award to our client in Supreme Court, Westchester County that was due on January 21. In addition, I am scheduled for surgery this coming Monday and I have a pre-operative appointment tomorrow morning, which will make it even more difficult to complete the reply/opposition brief by tomorrow. Plaintiff's counsel has graciously consented to our request. This is our first request for an extension of the reply/opposition deadline. Thank you for your consideration.

Respectfully submitted,

Robert B. Weissman

cc:

<u>Via ECF</u>

Steven Metcalf, Esq. Metcalf & Metcalf, P.C. Granted.

So Ordered.

**4**197199